## Case 3:05-cv-00174-JWS

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July 5, 2006

M. Celeste Barras 160 Ocean Park Drive Anchorage AK 99515-3401

RE: Celeste Barras v. U.S. Healthworks et al.

U.S. District Case No. A05-0174 CV

Dear Ms. Barras:

As ordered by the Court, you were required to provide our office with Rule 26 initial disclosures by July 5, 2006. The document you submitted "Plaintiffs' Initial Disclosures" does not provide the information required under Federal Rule of Civil Procedure 26(a)(1)(A)-(D). Specifically, you are required to provide defendants with the following:

- (A) the name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information;
- (B) a copy of, or a description by category and location of, all documents, data compilations, and tangible things that are in the possession, custody, or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment;
- (C) a computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered; ...

Exhibit A
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Please provide our office with the required disclosures by Monday, July 10. If we have not received initial disclosures by that date, our firm will again seek assistance from the Court in the form of a motion to compel and request the Court impose further sanctions. Thank you.

Very truly yours,

TURNER & MEDE, P.C.

Attorneys for Defendants HealthSouth Medical Clinics of Anchorage, LLC & U.S. Healthworks

Holding Co. Inc.

Patricia A. Vecera

PAV/kat